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Plumas National Forest
Forest Supervisor Earl Ford

Re: OHMVR Grant Applications

Thank you for the opportunity to comment on the Plumas N.F. 2013 grant applications. We take the grant program very seriously and want to see every dollar of our green sticker fees used wisely and honestly.

We are concerned that the Beckwourth R.D. decided to drop the summer portion of last year's Lake Davis Summer/Winter grant (G11-02-13-P03). We expect that all grants will be carried forward and implemented as written.

We are disappointed that Beckwourth R.D. didn't request funds to plan routes out of Crocker Campground, which is mitigation for the FHWA project that was agreed to by the District Ranger last year.

In the past, OHV grant funds have been viewed by the Forest Service as the "cash cow", often with inflated costs and spending without any accountability for actual accomplishments. We hope to see changes in that attitude, as State funding continues to decline. Efficient use of these limited funds is essential. We want the Forest to be responsive to our requests for information, which have been ignored in the past.

We are concerned that a specific contractor is already named in several of this year's Plumas N.F. grants. Since these are large contracts over \$100,000 we want to see competition for the work, as there are several local contractors who have also expressed interest in this work. Competition would assure the taxpayers that the best price is being obtained, whether through a contract or a cooperative agreement.

We are also concerned that several of the grants appear to claim the same partners for duplicate and/or unrelated work (ie. claiming Quincy Rotary's contribution on the non-motorized "South Park" project) as a partner in this year's motorized OHV grant applications. We believe partnerships should be applicable to the project being proposed.

Considering environmental issues for pollution and noise, we recommend that all equipment purchased by the State for Forest Service use should be 4 stroke engines.

We are pleased that the forest has some good project proposals this year and, in an effort to strengthen the grant applications, we offer the following comments.

Ground Operations (G12-02-13-G01)

Project Description:

- OHV funds are intended to enhance the OHV recreation experience, but only 55.1 miles of trail maintenance is included in this project. Why aren't more miles being proposed?
- Page 1 states there will be 4 wilderness toilets installed on Feather River RD. But when we contacted the district, they said there are only 2.
- Page 2 C states there are 4482 mi. of routes available on the PNF, but the vast majority of these are system roads and many are not even eligible for OHV funds. This statement is misleading, since only 55.1 miles (1%) of those routes are proposed for maintenance in this project.

Direct Expenses:

- Item 1 is for 2 months of road crew time but it is unclear what they will do other than place boulders as barriers, which is only a few days work.
- Direct Expenses show 0% match for GS-5 (total of 1020 days). Please provide justification for OHV funds to pay for these salaries with no match from the Forest.
- Pages 6 and 7 show 280 days for GS-7's on each district. This is 5 months time for each employee, which is virtually the whole summer season. How can we be assured that these GS-7 employees will work 100% on OHV, and not other recreation issues that arise daily on the districts? We have repeatedly asked for cost accounting and accomplishment reports from the FS over the past 2 years and have not received a response from the Forest.
- Page 6 and 7 have two line items for 2 full-time GS-5 on FRRD. This appears to be a duplication.
- Page 6 says work will be done at Crocker and McRae Campgrounds. In 2016 OHVs will no longer be able to access the Crocker CG due to a paving project. The OHV-funded toilet at McRae will not be installed due to high groundwater, so maintenance costs for that remote campground are very minimal. Costs may need to be adjusted for these two campgrounds.
- Materials/Supplies page 8 has a \$1000 fire ring at Four Corners. This cost seems excessive plus there are no tables or toilet at this site, so it is unclear why a fire ring would be installed without other facilities. Is the FS encouraging bonfires at this site?
- Materials/Supplies page 8 has funding for repair of 4 wilderness toilets, but FRRD says there are only two. The cost should be adjusted.
- Page 9 shows government mileage at \$9.25/mi. This cost is excessive.
- Page 9 shows a Dozer for placing boulders. A dozer doesn't have capability to load and place boulders. A backhoe/loader must be used and the cost adjusted.
- Page 9 OHV/OSV fuel, oil, repair cost of \$2666 per vehicle for one year is excessive.
- Page 10 asks for a Cargo Storage Container for Beckwourth District, a request which has previously been denied by the State. The container would almost certainly be used for storage of non-OHV items. If security is a problem at the Mohawk Ranger Station it should be dealt with by Forest Service management, and not at the expense of State OHV Grant Funds.

Evaluation Criteria:

- Item 2A mentions 11.6 miles of trails that wouldn't be added if this grant isn't funded. But when SAC was seeking local grant funds Pete Hochrein said that Table 2 routes, which need mitigation before being added to the system, were being taken care of by a contractor using a different grant. So he told SAC not to apply for the funds.
- Item 3A says only 55.1 miles will be maintained but there is no map. So we can only comment on the number of miles. The low mileage is unacceptable, considering this application is requesting \$464,295 in grant funds. More mileage must be added to this grant request.
- Item 6A says some trails will be decommissioned, but there is no map attached so it is impossible to tell which trails will be decommissioned, what the cost is, and if the environmental documents and public comment are completed.
- Item 6B says bridges will be built, which is a high cost item, yet no location is mentioned in the grant application.

- Item 7 says onsite materials are recycled. The boulders are natural, but are not recycled. Where are concrete tables going to replace wooden tables? This is not mentioned in the project description.
- Item 8 – Hybrid vehicles are only used on highways, so this statement is irrelevant for this project. All campgrounds on the PNF have gravity feed water systems, so there are no low-flow water fixtures which require pressurized systems.

As a general statement, the majority of this grant appears to fund the Recreation Program on the PNF which we support in its goal to work on OHV issues. However, the intent of the OHV grant program is to enhance OHV use and only a token amount of mileage (only 51.1 miles) are being proposed for maintenance with this \$464,295 grant request.

FRRD and Mt Hough Ground Operations (G12-02-13-G02)

SAC supports these projects and has been working with the PNF on details. However, this grant application raises some questions that need clarification.

Project Description:

- There is no map attached, so it is impossible to know which trails (20.8 mi.) are proposed for maintenance.
- This project is only for maintenance, which does not require “prevailing union wages”. Under Federal Procurement Regulations, maintenance work only requires Service Contract wages which are significantly less than what is proposed in the application. Costs should be adjusted to save taxpayer money.
- The use of hybrid cars on highways is irrelevant to this project.
- As a result of the 6 meetings and workshops cited in 2007, many of the trails proposed by this project were rejected. User groups have again proposed the routes in these areas, and the Forest Service is expected to make a decision in May when the EA for the Mt. Hough/South Park trails will be signed.
- Project description says there will be trail reroutes, but item 2 “Rerouting Requirements” says there is no rerouting. Evaluation Criteria #6 also says there will be rerouting. Clarification is needed.

Direct Expenses:

- Item 1. A GS-11 is not the grade level that is used for this type of work. The job description for a GS-9 level is appropriate and will save taxpayer money.
- Item 2. Contract - The number of days and cost seem to be excessive for only 20.8 miles of maintenance, especially when 27% of the work is being accomplished with volunteer labor. This is over \$7000 per mile for maintenance. Is this cost consistent with comparable work on other forests?
- Item 4. What is included in the Cooperator equipment match of \$1519/day? This seems excessive. Typically the cost of a contractor’s equipment is included in the contract amount.
- Item 4. Cooperator travel match - How is this calculated? It seems excessive. Is the cooperator using car pooling to save fuel and money?

Evaluation Criteria:

- Item 2. Pete Hochrein told SAC that a contractor was already taking care of the Table 2 routes that need mitigation using a different grant, so SAC was told not to apply for grant funds.
- Item 6. Where will the 6-ft. wooden bridges be constructed? This is a significant cost item so more information is requested.
- Item 7. Boulders for barriers are not recycled, they are either available on site or will be purchased.
- Item 7. What is the recycled material that will be used for erosion control?
- Item 8. Hybrid fleet vehicles are only used on paved roads, so it is irrelevant to this project.
- Item 8. All campgrounds on the PNF have gravity feed water systems so there are no low-flow water fixtures, which can only used with pressurized water systems. Most OHV campgrounds have no water systems at all. No buildings are being painted in this project, so the use of eco friendly paint is irrelevant.

Mt. Hough Trails Development (G12-02-13-D01)

SAC supports this project and has been working with the PNF on details. However, this grant application raises some questions that need clarification.

Statement of Development Activity:

- A. 10.2 miles are proposed for construction, but no map is attached. The Mt Hough/South Park Project, which is expected to have a signed EA in May, proposes construction of 8.5 mi. of motorized and 1.7 mi. of non-motorized trails for a total of 10.2. Without a map it is unclear which trails are proposed for construction under this grant. If it is only the 8.5 miles, that is \$14,000 per mi. which is excessive.
- A. According to botanist reports, the noxious weeds are located only on existing routes, not on the new construction routes that are proposed by this grant. This funding should not be used for weed removal on existing routes.
- A. The application states it will use “prevailing union wages”, but according to Federal Procurement Regulations, Davis-Bacon wage rates are the appropriate wages for federal construction project, which may adjust the contract cost.
- A. The use of hybrid vehicles is irrelevant to this project, since the hybrid cars are only used on paved roads.
- D. Timeline states the work will be split into 3 years, with completion in 2016. This \$119,003 contract should be completed in one year, which is a realistic timeframe. A contractor or cooperator can be found with the resources to complete the project within one year.
- How will these trails be designed to avoid the catastrophic trail failure and resource damage that occurred this fall in the Lakes Basin area on trails that were built by Sierra Buttes Trail Stewardship?

Direct Expenses:

- 1. GS-11 is a higher paid employee than is needed for design and administration. This work is consistent with the job description of a GS-9, which will lower costs. Also, the stated rate of \$50/day for a GS-11 is not correct.
- To maximize taxpayer funds and keep costs lower, we want the contract/agreement to be put out for competition. There are several local contractors interested in this work.
- 4. Are the equipment costs (\$28,880) included in the contract amount of \$119,003? Also, this cost seems excessive. How is this amount calculated? Is the cost per mile consistent with other similar projects in California?
- 4. Government vehicle 0932 costs \$0.39/mi., not \$0.81/mi.
- 4. There are two lines for Travel Match by Cooperators. Is this a duplication? Also, the cost of \$7,680 for travel seems excessive. How is this calculated?
- A total of \$37,924 for equipment use seems excessive.

Indirect Costs:

- 1. Project Administration – Is this a duplication of the GS-11’s 110 days on line 1? A total of 160 days (8 months) of engineering time on this project seems excessive. Is the FS committing to devote a full-time position to this project?

Evaluation Criteria:

- 3. This project is only for single-track motorcycle trails. 4x4, RUV, Dune Buggy and ATV will not be allowed on these trails. For snowmobile use, will the trails be listed in the database as OSV trails?
- 4. Publicly Reviewed Plan - The Travel Management FEIS did not support the need for this project and, in fact, the FEIS rejected many of these trails. This project will be supported by an EA, which is expected to be signed in May.

- 5. Information provided regarding recycled materials may not be accurate. Signs will be recycled. However, barriers are natural rock, not recycled rock. What recycled materials will be used for erosion control and retaining walls? And where will the retaining walls be located?
- 6. Hybrid vehicles are not used off paved roads. The items listed in this section are irrelevant.
- 13. The box is not checked for bridges, however directly below this unchecked box, it says bridges will be constructed. Since there are bridges, there must be riparian and wetland areas present but Item 13 says the project doesn't contain riparian/wetland issues. This is confusing and clarification is requested.

Chilcoot Staging Area (G12-02-13-P01)

SAC is supportive of this project, which will benefit the OHV community and the high number of people who come from Reno to ride trails. We recommend that the state fund this project. However, a few points need to be clarified to strengthen the proposal.

Direct Expenses:

- Item 1. Resource Specialist time seems excessive for such a small project. There needs to be a breakdown to support 60 days of their time.
- Item 1. 3 weeks of GIS time is not needed. This is excessive for a project of this size.
- Item 4. Field vehicle rate of \$9.25/mile is excessive and the math in the note doesn't add up.

Indirect Expenses:

- What is included in the 15 days (3 weeks) of Administrative Costs? This seems excessive for a project of this size.

Dispersed Camping (G12-02-13-P02)

SAC is supportive of this project, which will benefit the OHV community. We recommend the State fund this project. However, to make this project more competitive, a few points need to be clarified:

Statement of Planning Objectives:

- There are 100 sites proposed, but then it states "Based on funding the Forest will analyze as many sites as possible." With this vague statement in the application, how will the State hold the FS accountable for accomplishments? (For example, in the past the archaeologist requested \$20,000 to study one short existing route to a campsite).
- No map is provided, so it is impossible to know which sites will be studied.
- The description says "sites with no concerns or issues will have the access routes added to the MVUM". Will this study consider mitigation measures, or will routes with potential issues simply be disregarded and dropped from consideration?

Planning Project Criteria:

- Many of these sites were already considered during the Travel Management Planning process, so some of the specialist work is already done. (See Table 2 of the FEIS). Have costs be adjusted accordingly?

Law Enforcement (G12-02-38-L01)

SAC supports responsible use of trails, and we support law enforcement efforts if and when they are needed. However, the OHV fund was created to improve the motorized recreation experience for the public, not for Law Enforcement. Their funding requests should be modest and reasonable. We have comments on some of the expenses that are in the application.

Proposed Project:

- Item 1 – Four Trees is not a staging area, it is only an OSV warming hut. Law Enforcement historically only goes to the four staging areas listed.

- Item 3 – FPOs work “during daylight hours”. Why are light bars and spot lights being requested in this grant?
- Item 4 – Gansner Bar is not directly adjacent to the High Lakes OHV area. High Lakes is many miles away and cannot be accessed from Gansner Bar. The only access is from Hwy 70 at Rock Creek or Jackass Creek on the PNF, or else through the Lassen NF road system.

Direct Expenses:

- 1. Rates for Patrol Captain are assumed to be higher than for the LEO's. Are these rates transposed?
- 3. Costs for Light Bar, Safety Light Bar, and Flood and Spot Lights are excessive.
- 3. GPS Maps – Other mapping resources are currently available to PNF employees at no additional cost, so why is the GPS Maps Program needed for LEOs? Why are they not using the same maps that are given to the public? Please provide more information to justify this purchase.
- 3. Seismic Sensor – This needs to be justified. This is a high cost item and is not necessary for OHV/OSV uses. To prevent intrusion into the wilderness, we recommend that law enforcement first try posting signs in the problem areas. It is unclear where the actual boundaries are in some areas because they are not posted.
- 3. Maintenance and Repair - \$3000 for the year seems excessive. This cost needs to be justified. Damage caused by inexperienced operators, which has happened in the past, should not be in the budget.
- 3. Why are new ear microphones needed? The LEOs already have hands free devices. Justification is requested.
- 5. UTV Tracks for winter – This item is strongly discouraged. A UTV on snow is very unstable, very slow, unsafe on sidehills, sinks in powder, and can only operate on hard packed snow. Snowmobiles can access all areas, so we question why a UTV needs to be used in winter? We are concerned that accidents and damage due to using the wrong equipment for the job will cost OHV funds for repairs.
- 5. Since purchase of both snowmobiles and a trailer are requested, we assume this is a fleet addition rather than a replacement. Please provide justification for additional snowmobiles.
- 5. The cost of the snowmobiles (\$12,000 each) appears to be for a RMK type sled which is a hill climbing machine for experienced riders. If new snowmobiles are justified for enforcement patrol, they should be basic utility models which cost under \$10,000, are much less expensive to maintain and are more suited to the skill level of the operators, which has been demonstrated in the past. The RMK type snowmobiles are two strokes. Due to environmental issues and noise levels, we believe all Forest Service snowmobiles purchased by the State should be 4 stroke machines. If these snowmobiles are replacements, have repairs on existing machines been considered rather than replacement? Please provide details.
- 5. Snowmobile Trailer – This cost is excessive. A basic tilt double-wide trailer costs under \$3000. A more expensive enclosed trailer would cost \$6000 and needs to be justified.

Thank you for the opportunity to comment on the grant applications. We support your projects, and hope our input helps to make your grant applications stronger and more competitive.

Corky Lazzarino

Executive Director

Cc: OHVMR Division

Cc: SAC Steering Committee

Cc: Plumas County Coordinating Council

Cc: CORVA

Cc: Recreation Outdoors Coalition